

PETITION: SMALL CLAIMS CASE

03-SC-22-00042

Received
1/24/2022 12:57 PM
Judge Missildiné - Precinct 3
Collin County, Texas

CASE NO. (court use only) _____

In the Justice Court, Precinct 3, Collin County, Texas

Jeffry Simpson
PLAINTIFF

VS.

Helbing Law Group 1275 Glenlivet Dr Ste 100 Allentown, PA 18106
DEFENDANT(S)

COMPLAINT: The basis for the claim which entitles the plaintiff to seek relief against the defendant is:

Plaintiff received 3 unsolicited calls to his cell phone ending in number 0529 from 11/04-11/10/21 from Defendant's company/lead generator for the solicitation of debt relief assistance using ATDS/pre-recorded messages; a violation of TCPA 47 U.S.C. §227(b). Plaintiff has been on the National Do Not Call Registry since 6/18/2011 and said calls also violate TCPA 47 U.S.C. §227(b)(C). Said calls also violate Section 302.101 of the Texas Business and Commerce Code.

It is Plaintiff's belief that Discovery will uncover additional calls from Defendant prior to this time period.

RELIEF: Plaintiff seeks damages in the amount of **\$19,000.00**, and/or return of personal property as described as follows (be specific): _____, which has a value of _____

Additionally, plaintiff seeks the following:

court filing fee, process service fees, & any additional court costs

plus all costs of court as allowed by law.

SERVICE OF CITATION: Service is requested on defendants by personal service at home or work or by alternative service as allowed by the Texas Justice Court Rules of Court. Other addresses where the defendant(s) may be served are:

Erik Helbing 1275 Glenlivet Dr #100 Allentown, PA 18106

☒ If you wish to give your consent for the answer and any other motions or pleadings to be sent to your email address, please check this box, and provide your valid email address: soonerintx2121@gmail.com

I declare under penalty of perjury, pursuant to the law of the State of Texas, that all information provided is true and correct.

Jeffry Simpson

Petitioner's Printed Name

/s/ Jeffry Simpson

Signature of Plaintiff or Attorney

2913 Country Place Dr

Address of Plaintiff's Attorney, if any, or Plaintiff if none

PLANO, TX 75075

City

State

Zip

918-361-0529

Phone & Fax No. of Plaintiff's Attorney, if any, or Plaintiff if none
soonerintx2121@gmail.com

DEFENDANT(S) INFORMATION (if known):

DATE OF BIRTH: _____

*LAST 3 NUMBERS OF DRIVER LICENSE: _____

*LAST 3 NUMBERS OF SOCIAL SECURITY: _____

DEFENDANT'S PHONE NUMBER: 800-413-5011